



## STAFF ROLE AND RESPONSIBILITY

### Proposed Policy Change Approved on First Reading

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The Higher Learning Commission (HLC) Board of Trustees (“the Board”) approved this policy on first reading at its meeting on November 5–6, 2020.

#### Background

The proposed policy revision would clarify the role of staff in evaluation visits, clarify key aspects of the staff role beyond evaluation visits and reflect recent updates to and codification of conflict of interest procedures for HLC staff.

#### Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on February 25–26, 2021. Comments can be sent to [policycomments@hlcommission.org](mailto:policycomments@hlcommission.org). Comments are due by January 18, 2021.

#### Proposed Change

Wording that was deleted or revised is shown as strikethrough (~~old wording~~); new language, whether through addition or revision, is shown in bold (**new wording**).

Policy Title: Staff Role and Responsibility

Number: COMM.B.10.010

~~The HLC staff of the Commission shall be responsible to the President of the Commission, or and~~ **ultimately** responsible to the President of the Commission, **or and** to any intermediate supervisor who reports to the President, who in turn shall be responsible to the Board of Trustees. The staff shall assist institutions in the accreditation processes, implement ~~Commission~~ **HLC** policy, and carry out other responsibilities given it by the President ~~and by Commission policy~~ but ~~shall not serve as an advocate for any~~ **is not a representative for the institution in the accreditation relationship.** ~~The~~

~~Commission~~ HLC staff shall have the discretion to establish and modify ~~Commission~~ procedures in keeping with the intention and spirit of ~~Commission~~ HLC policy.

### Institutional Liaison

A staff member of ~~the Commission~~ HLC shall be assigned to each ~~affiliated member~~ institution to serve as the primary liaison between ~~the Commission~~ HLC and the institution, and to ensure that the institution receives effective service ~~on behalf of the Commission~~.

### Commission Staff on Non-Evaluative Visits

The staff liaison may conduct a non-evaluative Staff Campus Visit based on an institution's invitation. Such a visit has no bearing on the outcomes of the institution's pending evaluations, or any of HLC's procedural decisions concerning the institution.

### Commission Staff on Evaluation Visits

The ~~Commission~~ staff liaison or other ~~Commission~~ staff members may accompany the evaluation team on ~~certain~~ a visits. ~~These visits include:~~

- ~~• Advisory Visits~~
- ~~• Visits for Removal of Sanction or Show Cause~~
- ~~• Visits for Candidacy or initial accreditation~~

~~The President of the Commission~~ HLC shall determine whether the staff liaison or other ~~Commission~~ HLC staff members will accompany a specific evaluation visit. The ~~Commission~~ President also has the discretion to determine that circumstances warrant having a ~~Commission~~ staff liaison or other ~~Commission~~ staff member ~~accompany evaluation visits other than those visits expressly noted above~~ present on a visit. **Established procedures involving staff constitute presumptive evidence of a grant of Presidential authority to conduct activities in accordance with such procedures.**

The role of ~~the Commission~~ a staff member accompanying any evaluation visit ~~shall~~ **may** be (1) to support the team as needed **in its evaluation, including** with guidance on ~~Commission~~ HLC policy and procedure; (2) to ~~answer questions from the public or institutional representatives about~~ **clarify** ~~Commission~~ HLC processes related to the visit **to institutional representatives**; (3) **as part of an onboarding or training exercise**; ~~and (3) or (4) to observe the visit.~~ When preparing to take **any** action regarding the institution **as a result of the visit**, the Board of Trustees or Institutional Actions Council may ask the ~~Commission~~ staff member to discuss the evaluation visit **and the institution's accreditation history**, but the staff member will not prepare any written

~~report evaluation~~ separate from the ~~team report prepared by the evaluation team~~. HLC may authorize staff or employ other individuals with appropriate expertise to prepare memoranda, analyses, summations or resolutions for HLC decision-making bodies based on established procedures.

~~In addition, Commission staff shall participate as a team member in any Fact Finding Team related to Change of Control, Structure or Organization or in any on-site investigation of any serious complaint or legal, ethical or other related issue at an institution.~~

### Staff **Objectivity and** Conflict of Interest

~~The President will remove any liaison activities with an institution from a member of the professional staff when it appears that a conflict of interest might be present. It shall be a matter of staff responsibility for staff to inform the President when a potential conflict of interest might exist. In determining conflict of interest, staff shall weigh such things as past attendance, previous and/or prospective employment, the status at an institution of close personal friends or family members, or the holding of privileged information not available to others involved in the evaluation process.~~

The President has final authority for making all determinations regarding objectivity and conflict of interest. Staff shall adhere to internal policies and procedures established by HLC to ensure timely and accurate disclosure of circumstances that may lead to the identification and management of any potential conflicts of interest or other objectivity concerns.

### Policy Number Key

*Section COMM: Commission Obligations*

*Chapter B: Commission Staff*

*Part 10: General*

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*Last Revised: November 2012*

*First Adopted: January 1983, November 1991*

*Revision History: November 2012*

*Notes: Policies combined in November 2012 – 14.1, 14.2, 15.1*

*Related Policies:*